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May 1, 1986

R82-1B
PC #35

CERTIFIED MAIL

Mr. Jacob D. Dumelle, Chairman
Illinois Pollution Control Board
State of Illinois Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

Subject: Comments on R82-1, Docket B

Dear Mr. Dumelle:

The Commonwealth Edison Company (Edison) has followed with great interest, and concern, the matter of R82-1 (Particulate Emissions Limitations, Rule 203(g)(1) and 202(b) of Chapter 2). Our concern is based on the fact that USEPA has stated that "unless the Board adopts a replacement for the remanded particulate rules which can be approved by USEPA," the Agency may be forced to "impose another growth moratorium" that would ban the construction and modification of major industrial particulate sources in some parts of Illinois. Edison supports adoption of the particulate rules as put forth in Docket A of this proceeding. If the Board decides that adoption of opacity standards are justified, Edison offers the following comments on the proposed amendments presented at the April 28, 1986 merit hearing:

Proposal to Amend Section 212.124(c)

Edison is in general agreement with the proposed amendments to Section 212.124(c) in that it specifies how a source can defend itself against an alleged violation of the particulate standard due to opacity recordings above 30%, by conducting a subsequent performance test of the unit under similar operating conditions. This is covered in proposed section 212.124(c)(1). The defense against a claim of opacity violation as covered in proposed Section 212.124(c)(2), however, may be difficult to make because of the vagaries of visual emissions. The source may not be able to reproduce a visual opacity equal to or higher than the alleged violation because of some deviation in an operating parameter, coal quality or fineness, ambient temperatures and humidity, etc. For example, if a source is cited for an opacity exceedance of 55 percent and during a subsequent performance test the unit successfully demonstrates compliance with the particulate emission limit under similar operating conditions but the opacity reaches only 45 percent - "Is the source considered to be in violation?" We believe that if a source were to show compliance with the

mass particulate limit during such a test, there should be no penalty since opacity is admittedly a poor surrogate for the mass limit. On this basis, there should be no need for section 212.124(c)(2) since all cases of opacity readings greater than 30% would be covered by (c)(1).

It is therefore recommended that proposed section 212.124(c)(2) be deleted and that Section 212.124(c)(1) be modified to read as follows.

> An exceedance of the 30% limitation of Section 212.123 is prima facie evidence of a violation of the applicable particulate limitations of this Part. It shall be a defense to a violation of the applicable particulate limitations, as well as to a violation of Section 212.123 if, during a subsequent performance test conducted within a reasonable time, under similar operating conditions, and in accordance with Section 212.110, the owner or operator shows that the source is in compliance with the mass emission limitations.

This amended section continues to provide for an exception to both the 30 and the 60 percent opacity ceilings if a source can demonstrate particulate compliance. This provision is necessary for those sources where secondary plume formation (detached plume) is a characteristic of normal plant operation. Continuous Emission Monitors (In-stack transmissometers) are not capable of measuring the opacity of secondary plumes. Many sources with secondary plume characteristics consistently meet applicable particulate emission limits even though the opacity of the secondary plume may exceed 60 percent using USEPA's method nine.

"Reasonable Time" in Section 212.124(c)

Sections 212.124(c)(1) and 212.124(c)(2) include the passage "subsequent performance test conducted within a reasonable time . . . . " At the merit hearing, Mr. Berkeley Moore, IEPA, testified that he interpreted reasonable time as a period of approximately six months, whereas Mr. Pat Dennis, IEPA, later interpreted reasonable time as "several weeks." Edison believes that reasonable time should be specifically defined in the final version, and include a provision to allow under certain circumstances an extension of time beyond the specified reasonable time period for conducting a performance test. Furthermore, the reasonable time period should not begin until the owner/operator has received a notice of violation and has responded to the notice.

An example of when a request for an extension of time would be required is in the case of a source that can not be tested until several months after the notification is received because of a scheduled unit overhaul.

Section 212.126 Adjusted Visible Emissions Limitations

Edison generally concurs with the IEPA's proposed Section 212.126, with the exception of Section 212.126(d)(2) which reads "shall not allow an opacity greater than 60 percent at any time." There should be no opacity ceiling for any source that demonstrates particulate emission compliance. As William L. MacDowell, USEPA, testified, "USEPA recognizes fully that opacity is not a perfect indicator of mass emissions." Since opacity is a surrogate of mass emissions, 60 percent has no statistically significant correlation to particulate emissions. For example, sixty percent opacity at Source A could be equivalent to 0.11 lbs/MBtu, whereas for Source B, 60 percent may be equivalent to 0.07 lbs/MBtu.

To Edison's knowledge, there is no study that demonstrates that if a source operates above 60 percent opacity, it is incapable of meeting a 0.1 lbs/MBtu particulate emission limit. Any source that can demonstrate particulate compliance at opacity levels above 30 percent should be granted the adjusted opacity limit. And if the source demonstrate particulate compliance while above 60 percent opacity, the source should be allowed an adjusted opacity standard above 60 percent.

Respectfully submitted,

C. L. McDonough
Director of Air Quality

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